

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RUBY FREEMAN and WANDREA' MOSS

No. 24-cv-6563(LJL)

No. 24-mc-353(LJL)

Plaintiffs,

-against-

RUDOLPH W. GIULIANI

Defendant's Second Amended  
Initial Disclosures Pursuant to  
Federal Rules of Civil Procedure  
Rule 26(a)(1)

Defendant.

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Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant by his attorneys, Cammarata & De Meyer P.C. hereby provides the following second amended initial disclosures. These second amended initial disclosures reflect the current knowledge of Defendant and his counsel and are subject to and made without waiving Defendant's right to assert any and all objections as to competency, relevancy, materiality, privilege, work-product, use or admissibility as evidence, for any purpose, of any of these second amended initial disclosures, or of the subject matter of these initial disclosures, in this or in any subsequent proceeding. Defendant further reserves the right to supplement, amend, correct, or otherwise modify these initial disclosures as investigation and discovery are conducted.

**1. PERSONS WITH KNOWLEDGE**

**FRCP 26(A)(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

RESPONSE:

Rudolph W. Giuliani  
315 S. Lake Drive, Apt 5-D

Palm Beach Gardens, Florida 33480, is likely to have discoverable information regarding but not limited to the Rudolph W. Giuliani moving to Florida as his permanent residence which he actually and does actually occupy as his domicile.

Dr. Maria Ryan  
418 Walnut Street

Manchester, New Hampshire 03104, is likely to have discoverable information regarding but not limited to the Rudolph W. Giuliani moving to Florida as his permanent residence which he actually and does actually occupy as his domicile.

Ryan Medrano  
27 Maryland Plaza, Apt 1B  
St. Louis, Missouri 63108

is likely to have discoverable information regarding but not limited to the Rudolph W. Giuliani moving to Florida as his permanent residence which he actually and does actually occupy as his domicile.

Michael Ragusa  
Address unknown

is likely to have discoverable information regarding but not limited to the Rudolph W. Giuliani moving to Florida as his permanent residence which he actually and does actually occupy as his domicile.

Monsignor Alan Placa  
200 Eagleston Estate Boulevard  
Palm Beach Gardens, Florida 33418

is likely to have discoverable information regarding but not limited to the Rudolph W. Giuliani moving to Florida as his permanent residence which he actually and does actually occupy as his domicile.

## 2. DOCUMENTS

**FRCP 26(A) (ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

RESPONSE: The following are documents that Defendant has or will produce to Plaintiffs:

- (a) Deed dated February 11, 2010 in the name of Rudolph W. Giuliani and Judith S. Giuliani for the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida;
- (b) Deed dated January 14, 2020 in the name of Rudolph W. Giuliani for the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida;
- (c) Exclusive Right to Sell – Cooperative Agreement between Rudolph W. Giuliani and Sotheby's International Realty dated July 12, 2023;
- (d) Invoice #416642 from Corporate Transfer & Storage Inc. dated October 16, 2024;
- (e) Application for Homestead and Related Tax Exemption;
- (f) Notice of Proposed Property Taxes and Proposed or Adopted Non-Ad Valorem Assessments;
- (g) Real Estate Tax Bill from the Palm Beach County Tax Assessor / Collector;
- (h) Declaration of Domicile filed in the Office of the Palm Beach County Clerk on July 15, 2024;
- (i) New York State Department of Taxation and Finance confirmation of no Star

Credit;

- (i) New York Department of Finance confirmation of no Cooperative Condominium Abatement;
- (i) Florida driver's license of Rudolph W. Giuliani dated February 22, 2024;
- (j) Vehicle tag for 1980 Mercedes which bore Florida tag JA3414;
- (k) Voter registration in the State of Florida – voter registration number 132378699 dated May 17, 2024;
- (l) Personal Federal Income Tax Return for 2023 Redacted;
- (m) Calendar noting Defendants' presence inside and outside the State of Florida in 2024;
- (n) Photographs; and
- (o) Bank Statements;

**3. DAMAGES**

**FRCP 26(A) (iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

RESPONSE: Not applicable at this time.

**4. INSURANCE AGREEMENTS**

**FRCP 26(A) (iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

RESPONSE: None.

Dated: December 17, 2024  
Staten Island, New York

s/ joseph m. cammarata /

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